

## **Exhibit G**

**Brandi Marla Harris**

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

-----X  
In Re:

TERRORIST ATTACKS ON  
SEPTEMBER 11, 2001

03-MDL-1570 (GBD)(SN)

-----X  
JOHNN BASCI, et al,

**AFFIDAVIT OF  
BRANDI MARLA HARRIS**

Plaintiffs,

20-CV-00415 (GBD)(SN)

v.

ISLAMIC REPUBLIC OF IRAN,

Defendant.

-----X

STATE OF FLORIDA                     )  
  : SS.:  
COUNTY OF VOLUSIA                 )

BRANDI MARLA HARRIS, being duly sworn, deposes and says:

1. I am a plaintiff in the within action, am over 18 years of age, and reside at 582 Good Life Way, Daytona Beach, FL 32124.
2. I am currently 57 years old, having been born on February 18, 1965.
3. I am the wife of Mark Harris, upon whose death my claim is based, and submit this Affidavit in connection with the pending motion for a default judgment and in support of my solatium claim.
4. Mark passed away from tongue cancer on May 13, 2017, at the age of 54. It has been medically determined that this illness was causally connected to his exposure to the toxins resulting from the September 11, 2001 terrorist attacks.
5. Mark and I first met each other when I was just six months old. I was crying in my crib as Mark played Monopoly with my brother. My mother jokingly told me that I shouldn't

create such a fuss next to my future husband. Mark and I started dating when I was twelve years old. We were married for thirty-six years and had four children together.

6. Mark was an incredible husband and father. He filled my life with joy and purpose. We adored each other and were inseparable. I still reminisce about the time Mark and I traveled the world together on a cruise ship. We were each other's best friends. He made me feel like I had a fairy tale life.

7. Mark was a proud FDNY firefighter. After the September 11<sup>th</sup> terrorist attacks, Mark helped to rescue seventy-eight people from the World Trade Center building. He became trapped under the rubble of Tower 2 for nine hours after the buildings collapsed, and as a result, he lost both of his corneas and suffered from back and neck pain. Despite his injuries, Mark continued working and helped to clean up debris from the rubble and search for the remains of the fatally injured victims.

8. In 2014, Mark was diagnosed with thyroid cancer. He was also struggling to breathe after 9/11, because of the ground glass particles trapped in his lungs. He eventually became completely dependent on oxygen tanks.

9. In September 2016, Mark was diagnosed with tongue cancer, which eventually spread to his mouth, jaw, and brain. After Mark's cancer had metastasized, he was on a feeding tube for over a year. The cancer caused Mark's teeth to fall out, and he began to lose his memory. Mark's tongue had to be completely removed and reconstructed by grafting the skin and veins from his arms. He never regained complete use of his arms after the surgery. Mark was also diagnosed with Hodgkin's Lymphoma.

10. Mark underwent chemotherapy and radiation treatments. He was in the hospital for a very long time because he was having a heart attack almost every week. The doctors struggled to figure out how to treat the rapid spread of his cancer.

11. Mark had no quality of life after his surgeries. He had to re-learn how to eat, speak, and drink. Mark became depressed. He confided in me that he would rather have died on 9/11 than suffer from the cancer every day. Mark did not want to pass away at the hospital so we moved him back home as soon as we could.

12. My life completely changed after Mark was diagnosed with cancer. I quit my job in 2014 so that I could become Mark's full-time caretaker. I never left his side. I helped feed and bathe him. I took him to all of his hospital appointments. I even helped Mark with his speech therapy.


13. It was heartbreaking to see Mark suffer so much. Even though Mark was in a lot of pain, he still fought hard for our family. He underwent chemotherapy because he wanted to attend our daughter's wedding. Mark even planned a trip to Greece before he passed away. I did not want to ruin what hope Mark still had, so when his doctor told me that he only had ten days to live, I kept that information hidden from Mark. I canceled the Greece trip because I knew there was no way he would be able to make it. I wanted to be strong for Mark because that was what he deserved.

14. After Mark passed away, I felt completely hopeless and lost. Mark and I had known each other since we were kids. I never once imagined having to live a life without him. Not hearing Mark's voice or feeling his presence makes the silence at home that much more deafening. I lost the other half of me. I still suffer from PTSD. I don't think I will ever be able to

move on with my life.

  
BRANDI MARLA HARRIS

Sworn to before me this  
10<sup>th</sup> day of May, 2022

  
\_\_\_\_\_  
Notary Public



**Joseph Cronin**  
State of Florida  
My Commission Expires 10/28/2023  
Commission No. GG 926961

**Jonathan Eric Harris**

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

-----X  
In Re:

TERRORIST ATTACKS ON  
SEPTEMBER 11, 2001

03-MDL-1570 (GBD)(SN)

-----X  
JOHNN BASCI, et al,

**AFFIDAVIT OF  
JONATHAN ERIC HARRIS**

Plaintiffs,

20-CV-00415 (GBD)(SN)

v.

ISLAMIC REPUBLIC OF IRAN,

Defendant.

-----X  
STATE OF NEW JERSEY    )  
                                  : SS.:  
COUNTY OF HUDSON     )

JONATHAN ERIC HARRIS, being duly sworn, deposes and says:

1. I am a plaintiff in the within action, am over 18 years of age, and reside at 88 Clifton Place Apt. H523, Jersey City, New Jersey 07304.
2. I am currently 31 years old, having been born on July 2, 1990.
3. I am the son of Mark Harris, upon whose death my claim is based, and submit this Affidavit in connection with the pending motion for a default judgment and in support of my solatium claim.
4. My father passed away from tongue cancer on May 13, 2017, at the age of 54. It has been medically determined by the World Trade Center Health Program that this illness was causally connected to his exposure to the toxins resulting from the September 11, 2001 terrorist attacks.

5. My father was a busy man. When he wasn't at work, he would take me to baseball games, teach me how to play catch, how to shave—normal father and son activities. He put a lot of care into making sure I was safe and had my needs met. As I got older, we definitely got a lot closer and had a better relationship until he was diagnosed with cancer. His mental and physical state went downhill from there.

6. My dad was a first responder, who rushed to the World Trade Center site on September 11, 2001, as soon as the towers came down. He was in the FDNY, part of Battalion 22. He was gone for about two days before coming home from Ground Zero, and then he returned to help with search and recovery efforts for another few weeks or months. He told me about it, but it was very difficult for him to speak about it. I was in sixth grade when 9/11 happened, so there was a lot I didn't understand about the event. He told me, "There are things that happen in your life that will change you forever." 9/11 changed my father forever. He had nightmares and would wake up screaming. His mental health got worse and worse.

7. I remember learning of my father's cancer diagnosis like it was yesterday. I was in Atlantic City, and he called me and told me what happened. This was in October 2016. At the time, I was living in New York, and he was living in Florida. As soon as I learned of his diagnosis, I went down to Florida for about two weeks to care for him. I had to take off work. Since I work in sales, I missed a few commission-based opportunities during that time. My father went through a few different chemotherapy and radiation treatments. It was an extremely difficult time in his life, and the illness eventually took over his entire life.

8. The emotional impact of my father's illness and passing were devastating. I was recently diagnosed with Borderline Personality Disorder, and I had a mental breakdown about two years after my dad's death. I was just a shell of a person. I've been medicated to help with

my mental health issues. My father's illness and death played a huge role in what has happened to me. I struggled with the reality of not having that person there who I could always talk to, joke with, and think things over with. It's very saddening that I don't have any more time with my father, and it took a huge toll on me emotionally.


9. I wish that my father and I were able to spend more time together. I wish he could see how much I've grown and the man I've become. I wish he was here to witness my career success. He did get to meet my girlfriend, so that was really special. But there's a lot of things I haven't been able to tell him that I wish I could. I have been so negatively affected by his death.



JONATHAN ERIC HARRIS

Sworn to before me this  
6<sup>th</sup> day of ~~May~~, 2022  
July

Notary Public

  
DEEPTI S. JANI  
NOTARY PUBLIC OF NEW JERSEY  
ID# 50030035  
My Commission Expires Jan. 13, 2026

**Michael Ian Harris**

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

-----X

In Re:

03-MDL-1570 (GBD)(SN)

TERRORIST ATTACKS ON  
SEPTEMBER 11, 2001

-----X

JOHNN BASCI, et al,

**AFFIDAVIT OF  
MICHAEL IAN HARRIS**

Plaintiffs,

20-CV-00415 (GBD)(SN)

v.

ISLAMIC REPUBLIC OF IRAN,

Defendant.

-----X

STATE OF NEW YORK     )  
                              : SS.:  
COUNTY OF MONMOUTH)

MICHAEL IAN HARRIS, being duly sworn, deposes and says:

1. I am the plaintiff in the within action, am over 18 years of age, and reside at 212 Hidden Lake Drive, Morganville, New Jersey 07751.
2. I am currently 33 years old, having been born on June 12, 1988.
3. I am the son of Mark Harris, upon whose death my claim is based, and submit this Affidavit in connection with the pending motion for a default judgment and in support of my solatium claim.
4. My father passed away from tongue cancer on May 13, 2017, at the age of 54. It was medically determined by the World Trade Center Health Program that this illness was causally connected to his exposure to the toxins resulting from the September 11, 2001 terrorist attacks.

5. Growing up, my father was a paramedic and worked a lot. When he was home, we were involved in a lot of activities together. We enjoyed sports, having catches, biking, and collecting baseball cards. We loved bonding over everyday father-son activities. There was a time in my teens when my father and I didn't always see eye to eye. It was an extremely difficult time. As I grew older, our relationship improved.

6. My father was there at the World Trade Center site on the day of the attacks. He was a rescue medic, attempting to help as many people as he could. He witnessed the second tower coming down and was able to save a man's life from the falling debris. My father felt a duty to help others and continued to go back to the WTC site until the cleanup was complete. His actions earned him a medal from the FDNY.

7. My dad was a healthy man before his cancer diagnosis. I still remember clearly when he told me that he had cancer. When he said it was linked directly to 9/11, it wasn't a great shock. Still, he never shared with me the full extent of his cancer until it was too late. He was going through chemo and making progress until he wasn't. It was about a year after he told me of his diagnosis that I found out it was stage III or IV. It seemed I learned everything all at once, and it was already too late.

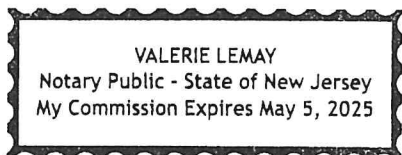
8. I miss my father terribly. He was and always will be my dad. I still collect baseball cards because of the love for them that he instilled in me. There are certain things I wish I still had him around for. I am his eldest child, and before he passed away, he gave me the important duty of looking after my mother. I know that my dad did the best job he could. He did more than most people could ever ask for.

9. My father's job took his health from him. The cretins who attacked the WTC took his life from him. Life is far too short. The truly sad part is that you don't get a second chance to make up for it.

Michael I Harris  
MICHAEL IAN HARRIS

Sworn to before me this  
9th day of May, 2022

Valerie Lemay  
Notary Public



**Gregory A. Williams**

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

-----X  
In Re:

TERRORIST ATTACKS ON  
SEPTEMBER 11, 2001

03-MDL-1570 (GBD)(SN)

-----X  
JOHNN BASCI, et al.,

**AFFIDAVIT OF  
GREGORY A. WILLIAMS**

Plaintiffs,

20-CV-00415 (GBD)(SN)

v.

ISLAMIC REPUBLIC OF IRAN,

Defendant.

-----X  
STATE OF NEW YORK )

: SS.:

COUNTY OF WESTCHESTER )

GREGORY A. WILLIAMS, being duly sworn, deposes and says:

1. I am a plaintiff in the within action, am over 18 years of age, and reside at 130 Pelham Road, #7D, New Rochelle, New York 10805.

2. I am currently 74 years old, having been born on May 22, 1947.

3. I am the husband of Gwynne K. MacPherson-Williams, upon whose death my claim is based, and submit this Affidavit in connection with the pending motion for a default judgment and in support of my solatium claim.

4. My wife passed away from pancreatic cancer on March 25, 2011, at the age of 57. It was medically determined that this illness was causally connected to her exposure to the toxins resulting from the September 11, 2001 terrorist attacks.

5. Gwynne and I lived together since 1980. We married and had a son in 1991. We spent every day together until her death. Every day, I would take her to the train station to go to work in the morning and would pick her up after work was done. We enjoyed hosting dinner parties, having dinner and meals at home, going on vacation, and spending nights out. We did everything a happy family would do.

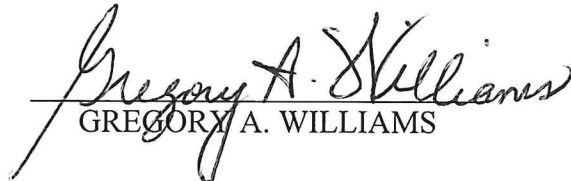
6. On September 11, 2001, Gwynne was working at 26 Federal Plaza as the District Deputy Director of Immigration and Naturalization at US Citizenship and Immigration Services. Gwynne fled her office and walked all the way uptown to 59<sup>th</sup> Street to cross the bridge. She came home covered in dust from being so close to the crash site. I think the office was closed for about ten days after, and she returned to work as soon as she could. She continued to work there until she was forced to retire due to her medical conditions.

7. In June 2010, Gwynne began to feel pain in her lower back, and I took her to the doctor. After a few tests, she was diagnosed with Stage IV pancreatic cancer. I was shocked, as she was generally in good health. Gwynne started immediately on chemotherapy, and she had a port installed to administer the chemo. She was pretty much debilitated. She couldn't digest food and things like that. Doing daily tasks became much more difficult for her.

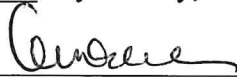
8. I was her primary caretaker. I cared for her full-time, cooked, cleaned, and things like that. I took her to our local cancer clinic in New Rochelle for all her chemotherapy treatments. Gwynne was still getting paid from her job during her illness, but she was out on disability so the pay was less than it had been. Gwynne was also the head of our household, so it was difficult taking over from her.

9. Losing Gwynne was extremely difficult. She was my life partner. She was somebody that I spent my time with.

10. Gwynne was dedicated to her work. She returned dutifully to her job in the exposure zone after 9/11, without fail and as a loyal civil servant. She worked for US Citizenship and Immigration Services for thirty-eight years. She went back to work knowing there were risks involved. She shouldn't have had to suffer the way she did. I miss her terribly. My life without her has never been the same.

  
GREGORY A. WILLIAMS

Sworn to before me this  
20<sup>th</sup> day of May, 2022

  
Notary Public

ERNEST B. BOLDEN  
Notary Public, State of New York  
No. 60-0345650  
Qualified in Westchester County

Commission Expires March 30, 2023

**John Basci**

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

-----X  
In Re:

TERRORIST ATTACKS ON  
SEPTEMBER 11, 2001

03-MDL-1570 (GBD)(SN)

-----X  
JOHNN BASCI, et al.,

**AFFIDAVIT OF  
JOHNN BASCI**

Plaintiffs,

20-CV-00415 (GBD)(SN)

v.

ISLAMIC REPUBLIC OF IRAN,

Defendant.  
-----X

STATE OF NEW YORK     )  
                                      : SS.:  
COUNTY OF QUEENS     )

JOHNN BASCI, being duly sworn, deposes and says:

1. I am a plaintiff in the within action, am over 18 years of age, and reside at 64-38 78<sup>th</sup> Street, Middle Village, New York 11379.

2. I am currently 53 years old, having been born on June 15, 1969.

3. I am the son of Marilyn Mucaria, upon whose death my claim is based, and submit this Affidavit in connection with the pending motion for a default judgment and in support of my solatium claim.

4. My mother passed away from lung cancer on December 2, 2014. It was medically determined that this illness was causally connected to her exposure to the toxins resulting from the September 11, 2001, terrorist attacks.

5. My mother was very involved in my life. We did everything together. We liked going shopping or to the grocery store, or just taking a walk around the park. She was everything to me. We always lived in the same home, even when she got sick.

6. On September 11<sup>th</sup>, 2001, my mother was working in Manhattan for the New York Police Department. She was a secretary at 1 Police Plaza, only a few blocks away from the World Trade Center. She told me how scary the 9/11 attacks were. There was smoke

everywhere, with people running around and screaming. The Police Department told her to stay home before about a week before she came back to the office. She continued to work at 1 Police Plaza until she retired, which was maybe a year or two before she died.

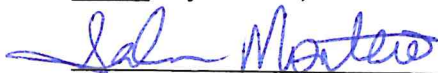
7. My mother began to have health problems almost immediately after 9/11, but it wasn't until later that we found out she got sick because of the World Trade Center. She was also traumatized after the 9/11 attacks. She was upset all the time, and her mind was all over the place. She wasn't the same person. Eventually, I started to notice that her physical health was declining. I didn't know about her cancer at first. I thought she was just sick. She didn't really want to talk about it.

8. Ultimately, my mother was diagnosed with lung cancer. The World Trade Center Health Program sent her all these applications and papers to fill out. She was very upset about her illness. She went to NYU Langone at Columbus Medical for chemotherapy and radiation treatments. The cancer treatments caused her a lot of pain. I remember watching the doctors put her in the machine for chemotherapy. I went to the hospital in Manhattan almost every day to visit her when she was going through chemotherapy.

9. I took care of her, helped her around the house, and took her to the store. At the end, she was too weak to even go to the store. She couldn't leave the house. It really upset me, knowing that there was no cure for my mother's cancer. There aren't words to describe how I felt. I was emotionally destroyed. I was throwing up from anxiety and depression. I thought to myself, "How could this happen to my mother?" There were times when I couldn't eat for days. I still get upset talking about it. I haven't been the same since my mother's passing. She's missed out on a lot in my life.

10. My mother really wanted to live. She was a naturally happy person, and she made me happy. That was all taken away from me, and it really hurts.

Sworn to before me this  
21 day of June, 2022

  
Notary Public



  
JOHNN BASCI

**Joseph Mucaria**

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

-----X  
In Re:

TERRORIST ATTACKS ON  
SEPTEMBER 11, 2001

03-MDL-1570 (GBD)(SN)

-----X  
JOHNN BASCI, et al.,

**AFFIDAVIT OF**  
**JOSEPH MUCARIA**

Plaintiffs,

20-CV-00415 (GBD)(SN)

v.

ISLAMIC REPUBLIC OF IRAN,

Defendant.

-----X  
STATE OF NEW YORK     )  
                                  : SS.:  
COUNTY OF QUEENS     )

JOSEPH MUCARIA, being duly sworn, deposes and says:

1. I am a plaintiff in the within action, am over 18 years of age, and reside at 81-04 45<sup>th</sup> Avenue, Elmhurst, New York 11373.

2. I am currently 68 years old, having been born on November 24, 1953.

3. I am the husband of Marilyn Mucaria, upon whose death my claim is based, and submit this Affidavit in connection with the pending motion for a default judgment and in support of my solatium claim.

4. My wife passed away from lung cancer on December 2, 2014. It was medically determined that this illness was causally connected to her exposure to the toxins resulting from the September 11, 2001, terrorist attacks.

5. Marilyn and I had a wonderful life together. She was my lover and best friend. We did many things together, including shopping, going to the movies, eating out at restaurants, and taking walks in the park. We loved to spend time together.

6. On 9/11, Marilyn worked as a secretary for the Chaplain Unit at One Police Plaza for the New York Police Department. Marilyn was in her office when the first plane hit the World Trade Center. She went outside her office to see what had happened, and that's when the

second plane hit the towers. She immediately got on the train to come home. She was so happy and relieved to get home safe that day. She took a couple of days off from work, but the NYPD was mandated to return to work as soon as possible, so she was in the office shortly thereafter.

7. In March 2014, Marilyn developed a dry cough, which she ignored. I was sick at the time, so Marilyn was taking care of me. She wasn't worrying as much about her own health. In May 2014, she began coughing up blood and had a lung biopsy in July 2014. Marilyn was diagnosed with metastatic squamous cell carcinoma. By the time she was diagnosed, she was showing even more signs of illness, such as significant fatigue and weight loss. The doctors explained to me that Marilyn's lung cancer was terminal. I broke down and cried. There was nothing I could do.

8. She went in for radiation and chemotherapy, but it didn't help. Surgery wasn't an option because the cancer was too advanced. She wasn't getting any better and just seemed to be getting sicker and sicker. The cancer spread to her brain and made her forgetful. We would go out to restaurants, and she wouldn't know where she was.

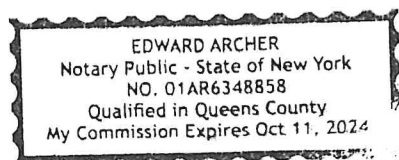
9. I was Marilyn's primary caretaker during her illness. I took her to all her doctor's appointments and treatments and tried to help as much as possible. I provided for her financially when she could no longer work and took care of her at home. But her condition deteriorated very rapidly. Toward the end, she was too weak to even go to the store or leave the house.

10. Since Marilyn's death, I've tried to date again. But no relationship I've had since is like the one I had with Marilyn. It's been disheartening for me. Marilyn was a good person with a big heart, and she was the only one for me.

  
JOSEPH MUCARIA

Sworn to before me this  
12<sup>th</sup> day of June, 2022

  
Notary Public



**Henrey Ricci**

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

-----X  
In Re:

TERRORIST ATTACKS ON  
SEPTEMBER 11, 2001

03-MDL-1570 (GBD)(SN)

-----X  
JOHNN BASCI, et al.,

**AFFIDAVIT OF  
HENREY RICCI**

Plaintiffs,

20-CV-00415 (GBD)(SN)

v.

ISLAMIC REPUBLIC OF IRAN,

Defendant.  
-----X

STATE OF NEW YORK     )  
                                  : SS.:  
COUNTY OF QUEENS     )

HENREY RICCI, being duly sworn, deposes and says:

1. I am a plaintiff in the within action, am over 18 years of age, and reside at 64-38 78<sup>th</sup> Street, Flushing, New York 11379.

2. I am currently 53 years old, having been born on June 15, 1969.

3. I am the son of Marilyn Mucaria, upon whose death my claim is based, and submit this Affidavit in connection with the pending motion for a default judgment and in support of my solatium claim.

4. My mother passed away from lung cancer on December 2, 2014. It was medically determined that this illness was causally connected to her exposure to the toxins resulting from the September 11, 2001, terrorist attacks.

5. My mother was always there for me. She took care of me. She was really the only person who was always there for me no matter what. She supported me mentally, financially, and emotionally. We used to go out shopping together, to restaurants on the weekends, and away on vacations. We would go everywhere together.

6. On September 11<sup>th</sup>, 2001, my mother was working at 1 Police Plaza. She was a secretary for the Chaplain unit of the New York Police Department. My mother was at her office

in the building when she heard a big explosion, which was the first plane hitting the World Trade Center. They all went outside to see what it was; they thought it was a plane accident. About ten minutes later, the second plane hit the World Trade Center. Then, they knew it was a terrorist attack. My mom came home early and told my brother and me about the attack on the city. Every time she saw something about it on TV, she'd start crying and had to walk away. She lived it—she was so close to it. It was traumatic for her. My mother was so upset about what happened to the country after that, and so was I. She took a few days off work, maybe two days. But the NYPD can't take off too long, so she had to go back to the office. She went back to work and did what she had to do.

7. Years later, maybe around 2012, doctors found a tumor on my mother's pelvis. She went for radiation and chemotherapy, but it was too late. The doctors should've told her earlier that she had cancer. The cancer started to spread to other parts of her body. She had a lung tumor and ultimately the cancer spread to her brain. Her mind wasn't right—she had to quit her job. The doctors neglected her. She became forgetful. She would tell us, "Oh, I'm going to make dinner." But she'd continue to just sit on the couch. Then fifteen minutes later, she'd say, "I'm going to make dinner," having completely forgotten that she had said it earlier. She would go out to restaurants and not realize where she was. She would dial the wrong phone numbers. She fell a few times because she lost her balance. I remember once when we went with her to chemotherapy, and she fell in the middle of the street trying to get to the hospital.

8. I tried to help my mother the best that I could. I would go grocery shopping with her, come inside and put away the food, cook, and clean up the house. She didn't have the energy to do those things like she used to. I felt bad that I couldn't help her more. My mom used to pay all the bills and manage our household. My father didn't know how to do that until my mom got sick, and then he had to take over. My mother was a very intelligent woman. She was the heart and soul of our family. Where she went, everyone went.

9. To this day, I still feel lost without my mother. I can't find happiness without her. When my mother died, a part of me died with her. I can still function, but I feel like a zombie. I'm just not happy. My mother was the closest relationship I had. My mother was saving up money for us to go to Hawaii, and the trip never happened because she got sick. I know I would've had a great time in Hawaii with her. But even if I went now, I wouldn't enjoy it. I wish I could be happy, but my life has never been the same since her death.

10. My mother was a good person, and she had a big heart. She was the glue of the family—she made everybody right. Everyone who came into her life loved her. She was the kind of person whose kindness stuck with others for many years. Friends would call her on the phone for advice, and she'd always make them feel better. Her life was taken away, and I feel like my life was taken away too.

Henrey Ricci  
HENREY RICCI

Sworn to before me this  
21<sup>st</sup> day of June, 2022

Sabrina Montero  
Notary Public



**Ellen Haggerty**

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

-----X  
In Re:

TERRORIST ATTACKS ON  
SEPTEMBER 11, 2001

03-MDL-1570 (GBD)(SN)

-----X  
JOHNN BASCI, et al.,

**AFFIDAVIT OF  
ELLEN HAGGERTY**

Plaintiffs,

20-CV-00415 (GBD)(SN)

v.

ISLAMIC REPUBLIC OF IRAN,

Defendant.

-----X  
STATE OF NEW JERSEY )

: SS.:

COUNTY OF MONMOUTH )

ELLEN HAGGERTY, being duly sworn, deposes and says:

1. I am a plaintiff in the within action, am over 18 years of age, and reside at 77 Boxwood Terrace, Red Bank, New Jersey 07701.

2. I am currently 61 years old, having been born on September 27, 1960.

3. I am the sister of Paul Murphy, upon whose death my claim is based, and submit this Affidavit in connection with the pending motion for a default judgment and in support of my solatium claim.

4. My brother passed away from cancers of the colon and appendix on January 4, 2018 at the age of 54. It was medically determined by the World Trade Center Health Program that these illnesses were causally connected to his exposure to the toxins resulting from the September 11, 2001 terrorist attacks.

5. Paul and I were very close. Our bond started at a young age since we are close in age. We were a tight knit family. Our closeness continued into adulthood. We loved to go on joint family vacations, and Paul's family often visited mine at my country house. Since we only lived a few blocks from each other, our families spent most holidays together as well.

6. Paul was a lieutenant in the New York City Police Department and was working on 9/11. When I heard about what had happened, I immediately tried to call my brother, but I could not reach him because the phone lines were down. I was nervous and truly worried about him. I was not able to get in contact with him until the next day because the phone lines were down. It was a horrible day. When I did finally reach Paul, he told me about trying to get people out of the city and the pure chaos that was going on around him. I don't know exactly how long he was down there for, but it was a long time. He worked many shifts and a lot of overtime. All in all, I believe he was there for a few months.

7. I learned of Paul's cancers in the summer of 2012. I knew he hadn't been feeling well and was seeing doctors, but I did not realize the extent of his illness. My brother called me and told me that he had cancer. I was shocked. I never expected those words to come out of his mouth. I took it really hard when he was sick. He was my baby brother. How could this be happening? He had always lived an active lifestyle and was a healthy person before the cancer.

8. As Paul's illness progressed and he started having surgery after surgery and treatment after treatment, it was extremely upsetting to me. The first surgery took more than 12 hours. The waiting was torturous, and we had no idea if he would even survive the surgery. Each time he would have a surgery or a treatment, he would have such awful reactions and side effects. These were all major surgeries and were taking a toll on him. Paul was such a great guy. He always had such a great attitude. It was devastating to see him go through that. My children were also close to their Uncle Paul and were shaken by what was happening to him. Watching him suffer was hard on them as well. It was unbelievable. Emotionally, we were all a mess.

9. After Paul's surgeries, I would often visit and stay with him. I wanted to be there for him. My mom wanted to be there too, and I would bring her along with me. Some of Paul's procedures took many hours, but we didn't care. We would stay as long as was necessary so Paul would know that his family was with him the whole time and that he was never alone.

10. His legacy is being such a great guy. Everybody loved him. He was very funny and witty, even as a kid. He always had a funny story or something to share. He was a genuine, kind guy, and everyone from adults to babies loved to be around him. There is a void in all of our

lives now that Paul is gone. There was no one like him. He can never be replaced.

  
ELLEN HAGGERTY

Sworn to before me this  
7 day of May, 2022

  
Notary Public

Charles N d'Emery-Edwards  
NOTARY PUBLIC  
State of New Jersey  
ID # 50167630  
My Commission Expires 8/12/2026

**Carol Murphy**

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

-----X  
In Re:

TERRORIST ATTACKS ON  
SEPTEMBER 11, 2001

03-MDL-1570 (GBD)(SN)

-----X  
JOHNN BASCI, et al.,

**AFFIDAVIT OF  
CAROL MURPHY**

Plaintiffs,

20-CV-00415 (GBD)(SN)

v.

ISLAMIC REPUBLIC OF IRAN,

Defendant.

-----X  
STATE OF NEW YORK     )  
                                  : SS.:  
COUNTY OF KINGS        )

CAROL MURPHY, being duly sworn, deposes and says:

1. I am a plaintiff in the within action, am over 18 years of age, and reside at 1134 79<sup>th</sup> Street, Brooklyn, New York 11228.

2. My current age is 56, having been born on August 12, 1965.

3. I am the wife of Paul Murphy, upon whose death my claim is based, and submit this Affidavit in connection with the pending motion for a default judgment and in support of my solatium claim.

4. My husband passed away from cancers of the colon and appendix on January 4, 2018, at the age of 54. It was medically determined by the World Trade Center Health Program that these illnesses were causally connected to his exposure to the toxins resulting from the September 11, 2001 terrorist attacks.

5. Paul and I were happily married. We met when we were in our early 20s and were married for almost 20 years when he became ill. Prior to his illness, we traveled extensively and saw most of the world with our daughters. We were a very active couple. We enjoyed date nights and going to concerts. We went to the gym regularly and went on long walks together.

We had a great life.

6. Paul was a lieutenant in the New York City Police Department and a first responder to the attacks on the World Trade Center on 9/11. He worked 12 to 14-hour shifts, 6 days per week at Ground Zero, for 6 to 8 months following the attacks.

7. Our entire life was shattered on September 8, 2011. That was the day Paul was diagnosed with pseudomyxoma peritonei, a rare form of colon cancer. It is terminal. In best case scenarios, surgeries can be performed to extend a person's life, but they are grueling and can be very risky. Despite the risks, Paul elected to have this grueling 8 to 12-hour surgery. In fact, he had to have it twice. Unfortunately, these were not the only surgeries Paul had to endure. He also suffered from bowel obstructions which required surgery. He had so many of these that eventually they could not be performed anymore due to the buildup of scar tissue. Complications came along with many of these surgeries, and Paul had to be fed intravenously for months on end. My poor husband, and I right along with him, suffered terribly for 6-1/2 years. His disease was simply devastating, not only to go through, but to watch someone you love go through.

8. My husband's illness was the most horrific ordeal of my life. It was tremendously stressful. All aspects of my life changed. Because his cancer was rare, treatment options were few and far between. The hospital where he had his surgeries is 90 minutes from our house. During his multiple hospital stays over the course of his illness, I had to make sure everything was taken care of for my family. I routinely coordinated help to get my girls to and from school and to extra-curricular activities. Since we had absolutely no family nearby, we had to depend solely on neighbors and friends. My typical day during one of his many hospital stays looked like this: I got up at 4:00 a.m. to cook dinner, do laundry, and clean my house. Next, I would get my daughters up at 6:00 a.m. for school and leave for work at 6:15 a.m. After working a full day, I would run up to the hospital to see my husband. I would pray that the persons responsible for caring for my children in my absence were on time and nothing went wrong. I would get home around 9:00 or 10:00 p.m., completely exhausted, and do it all again the next day.

9. During Paul's illness, my life was lived in three-month intervals. This was the time between scans to see if the cancer was stabilizing or progressing. I lived waiting for the other shoe to drop. I knew Paul was going to die. I just didn't know when it was going to

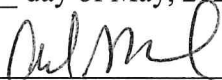
happen. My professional life suffered as well during my husband's illness. All my attention and energy were focused on caring for my husband and children. I turned down many promotion opportunities because I could not take on any additional responsibility. Our family was forced to buckle down financially due to Paul's medicals bills, his lack of work during his illness, and the detriment to my career while I served as his full-time caretaker.

10. My husband's illness was all-consuming and prolonged. I honestly have a hard time remembering him before he was sick. His illness invaded every aspect of my life. Even during our most intimate moments, my hand would graze the Mediport in his chest, and I would be reminded that our life together was going to be cut short. Knowing your husband is going to die is an experience in and of itself. I had to speak delicately to him. I didn't dare speak of the future or even bring up making plans for it.

11. It has been four years since my husband passed away. The years of time that we should have had together were stolen from us. I am now heading into my late 50s, and I am alone. Paul and I worked so hard to secure a good future so we could enjoy our retirement and grow old together. All that was taken away. I miss my husband and still I cry every day.

  
CAROL MURPHY

Sworn to before me this  
6<sup>th</sup> day of May, 2022

  
Notary Public



**Jordan Murphy**

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

-----X  
In Re:

TERRORIST ATTACKS ON  
SEPTEMBER 11, 2001

03-MDL-1570 (GBD)(SN)

-----X  
JOHNN BASCI, et al.,

**AFFIDAVIT OF  
JORDAN MURPHY**

Plaintiffs,

20-CV-00415 (GBD)(SN)

v.

ISLAMIC REPUBLIC OF IRAN,

Defendant.

-----X  
STATE OF NEW YORK     )  
                              : SS.:  
COUNTY OF KINGS     )

JORDAN MURPHY, being duly sworn, deposes and says:

1. I am a plaintiff in the within action, am over 18 years of age, and reside at 243 73<sup>rd</sup> Street, Apt. 2F, Brooklyn, New York 11209.

2. I am currently 21 years old, having been born on August 12, 2000.

3. I am the daughter of Paul Murphy, upon whose death my claim is based, and submit this Affidavit in connection with the pending motion for a default judgment and in support of my solatium claim.

4. My father passed away from cancers of the colon and appendix on January 4, 2018, at the age of 54. It was medically determined by the World Trade Center Health Program that these illnesses were causally connected to his exposure to the toxins resulting from the September 11, 2001 terrorist attacks.

5. I was 17 years old when my dad passed away.

6. I was very close with my father. He was like my best buddy. We loved to joke around and spend time together. We had a birthday party for my dad when I was a kid, and my parents told me to pick out a song for a dance with my father. I picked "You're My Best Friend"

by Queen, because my dad was my best friend.

7. My father was a lieutenant in the New York City Police Department and a first responder to the attacks on the World Trade Center on 9/11. He worked twelve-to-fourteen-hour shifts at Ground Zero, six days per week, for six to eight months after the attacks. I was less than a year old at the time of the 9/11 attacks, so I only learned this information secondhand.

8. On September 8, 2011, my father was diagnosed with a rare, terminal form of colon cancer. I was only eleven years old at the time and didn't really understand the severity of his illness. I only know that it scared me that my dad was sick. Despite the risks, my dad underwent a major surgery called a cytoreduction with HIPEC. He had to have this surgery twice. It was traumatizing having to "say goodbye" to him each time before his surgeries, because there was a good chance he may not have survived the procedures. But he was a fighter and always came through. My father endured this torture for almost 6-1/2 years.


9. As my father became more and more ill, my personal life began to suffer. It was hard to live life as a normal teen girl while my father was sick. In the beginning, there would be times where my dad would have to drive me to an extra-curricular activity. But all of a sudden, he'd start not feeling well, and my mom would have to arrange for someone else to pick me up at the last minute. My grades soon dropped, and I spent more time worrying about my father's health. I just couldn't seem to concentrate on anything else, because nothing else mattered. Everything our family did revolved around my dad's health. My mother was his primary caregiver, and I was always nervous that something would happen to her and I wouldn't be able to properly care for my dad. One night I pulled her aside and asked, "What if you're not here to set up dad's feeding tube?" I was so stressed about my father's health, and I wanted to do anything I could to help, but I needed to know I would do it right and not make anything worse for him.

10. My father was sick for one-third of my life. With every surgery and setback, I became more and more nervous and paranoid that I was in my final moments with my dad. It created extreme anxiety for me, which I still suffer from. I didn't want to go away for college, because I didn't want to be away from my family for too long. I also worry that something will happen to my mother. She's all I have left. I'm upset that I had to spend so much of my life watching my father wither away, and that I can barely remember the good times before his

illness. It hurts when I think of all the things that my father and I never got to do together. That hurts the most.

  
JORDAN MURPHY

Sworn to before me this  
9th day of May, 2022

  
Notary Public  
JASMINA KILOM  
Notary Public, State of New York  
No. 01KI4899718  
Qualified in Queens County  
Commission Expires July 6, 2023